



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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## RCRA CORRECTIVE ACTION PROGRAM

### STATEMENT OF BASIS

August 2023

Indiana Finance Authority  
Former IDOA Kentucky Avenue Warehouse  
601 Kentucky Avenue  
Indianapolis, Indiana  
U.S. EPA ID. IND981952815

#### I. INTRODUCTION

Under the Resource Conservation and Recovery Act (RCRA), all permitted and interim status hazardous waste treatment, storage, or disposal facilities are required to conduct corrective action for any releases of hazardous waste or hazardous constituents at or from their facilities.

This Statement of Basis is issued by the Indiana Department of Environmental Management (IDEM), regarding Former IDOA Kentucky Avenue Warehouse, 601 Kentucky Avenue, Indianapolis, Indiana 46204. IDEM has determined that no further corrective action is necessary for any of the identified Solid Waste Management Units (SWMUs) or Areas of Concern (AOCs) at this facility.

IDEM is issuing this Statement of Basis as part of its public participation responsibilities under RCRA Corrective Action Program guidance, and is using the administrative procedures found in 40 CFR Part 270, as adopted by reference, to provide public notice and solicit comments. The public notice period is hereby announced and will continue for 30 days from the published date of the Public Notice in *The Indianapolis Star*.

This Statement of Basis summarizes information found in greater detail in the work plans, reports, or other documents in this facility's administrative record, which can be accessed via IDEM's Virtual File Cabinet (VFC). IDEM encourages the public to review these documents in order to gain a more comprehensive understanding of the facility and the activities that have been conducted under RCRA authority. IDEM may modify this corrective action determination or select another remedy based on public comments or new information obtained.

This determination will complete the corrective action process under the RCRA Corrective Action Program for this facility. The facility must continue to comply with all applicable parts of RCRA.



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## II. FACILITY BACKGROUND

Portions of the facility have been used for a variety of commercial and light industrial uses since at least the late 1800s. A State of Indiana warehouse was located at the facility from at least the 1950s to 1990s. According to the RCRA Closure Investigation Report, the State of Indiana utilized the facility to store state and federal surplus items. Hazardous wastes were collected from various state properties and illegally stored at the facility (VFC document #82933802). A Notification of Hazardous Waste Activity Forms indicate that ignitable (D001), corrosive (D002), and toxic (D004) wastes were generated at the facility (VFC document #35828649). Approximately 90 containers of hazardous waste were removed from the facility between 1988 and 1989 (VFC document #82933802). During the 1990s and early 2000s, all buildings at the facility were demolished. The facility started to be utilized as a gravel parking lot by 2008. In 2019 the facility became a paved parking lot.

The facility was sampled as part of a neighboring Leaking Underground Storage Tank ("LUST") incident number 200403512 and further sampled as part of the adjacent Voluntary Remediation Program ("VRP") project number 6101101. While the facility was not a part of the LUST or VRP project, the sampling conducted, along with sampling completed as part of the RCRA Closure Investigation Report, sufficiently characterized the contamination at the facility. This sampling is further described in the Current Human Exposures Under Control determination (VFC document #82941780)

## III. SITE ASSESSMENT

IDEM conducted a site visit on November 25, 2019, to evaluate the facility for SWMUs and AOCs that required additional scrutiny. During this visit, it was observed that the facility is largely covered by a paved parking lot. No additional SWMUs or AOCs were noted.

IDEM personnel reviewed all available records related to the site to evaluate the facility for SWMUs and AOCs that required additional scrutiny. During this review, the following SWMUs and AOCs were evaluated:

- SWMU 1: Loading Dock Container Storage Area
- SWMU 2: Drummed Asbestos
- SWMU 3: Bulging Drum Area
- SWMU 4: Non-Hazardous Segmented Tank
  
- AOC 1: Spillage on Loading Dock
- AOC 2: Spillage inside Main Building

See Trip Report for the Case Development Inspection at 601 Kentucky Avenue for additional descriptions of the SWMUs and AOCs (VFC document #82545957).

The SWMUs and AOCs were all located in the area of investigation and remediation carried out by the RCRA closure, LUST, and VRP.

None of the SWMUs or AOCs showed evidence of a release that had not been adequately addressed.

#### IV. SUMMARY OF THE CORRECTIVE ACTION DETERMINATION

Based on the administrative record, IDEM is proposing no further action for all of the identified SWMUs and AOCs. IDEM is proposing that a Corrective Action Complete with Controls determination be issued for the Former IDOA Kentucky Avenue Warehouse facility. "With Controls" means an ERC has been recorded (VFC # 83525941) that requires a Soil Management Plan, limits the property's use to non-residential, and prohibits groundwater extraction for non-investigatory purposes.

#### V. PUBLIC PARTICIPATION

The public is encouraged to review and submit written comments on this proposed determination, particularly if you are aware of spills and/or releases that have occurred at this facility in the past. You may request IDEM hold a public hearing or a public meeting. At a public hearing, you would have the opportunity to submit oral or written comments. At a public meeting, you would have an opportunity to submit written comments, ask questions, make statements, and otherwise discuss any concerns about the Statement of Basis with IDEM staff. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing/meeting 30 days in advance.

The Public Notice and the administrative record are available for review on IDEM's Virtual File Cabinet. To view these documents, go to [www.IN.gov/IDEM](http://www.IN.gov/IDEM), and from the Online Services drop-down menu, select "Virtual File Cabinet" and then click on the Virtual File Cabinet link. After checking the "I'm not a robot" box, enter the document number in the upper right-hand corner of the document search page. VFC document numbers are provided in Section VI. for the primary documents IDEM used to support this decision. Additional documents pertaining to the facility's RCRA history can be viewed in VFC by searching the Alternate Field for Agency Interest (AI) ID #16445. Files related to the adjacent VRP investigation available under AI ID # 26859 and #11521, and files related to the neighboring LUST investigation are available under AI #20494.

Before taking final action, IDEM will give full consideration to all significant and relevant comments received. IDEM will summarize the comments and its responses to the comments, and announce its decision in a Final Decision/Response to Comments document. This document will be incorporated into the administrative record. To send written comments or obtain further information, contact:

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## VI. REFERENCES

Current Human Exposures Under Control, April 2, 2020, VFC document #82941780

Notification of Hazardous Waste Activity Forms, August 11, 1986, VFC document #35828649

RCRA Closure Investigation Report, March 20, 1995, VFC document #82933802

Trip Report for the Case Development Inspection at 601 Kentucky Avenue, November 3, 1988, VFC document #82545957

Environmental Restrictive Covenant, September 22, 2020 VFC document #83525941